REMARKS

This Response is submitted in response to an Office Action dated December 28, 2009. The 3-month due date for response is due to expire on March 28, 2010, accordingly this response is timely. In the event that the Commissioner determines that an extension of time or fee is due, the undersigned hereby petitions for such extension and authorizes the Examiner to charge the Milbank deposit account 13-3250 for any required fee.

In the course of prosecution, it was determined that Lestan D'Souza is an inventor of the claimed subject matter of this application. Pursuant to 37C.F.R. § 1.48, a Declaration of no deceptive intent, Declaration for Utility Patent Application, and a Power of Attorney all executed by Mr. D'Souza are enclosed herewith. The invention is assigned to Citigroup Global Markets, Inc. and a consent from Citigroup is also enclosed herewith.

Please add Mr. D'Souza as an inventor and update the filing receipt to reflect the change.

I.   Status of the Claims

The Examiner has indicated that claims 1, 8-10, 12-13, 21 and 23-24 are allowed, and claims 14-20, which were previously withdrawn, should be cancelled.
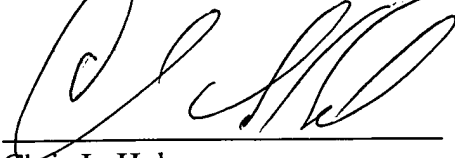
Please cancel non-elected claims 14-20 without prejudice. Claims 2-7, 11, 22, 25 and 26 were previously cancelled without prejudice. Claims 1, 8-10, 12, 13, 21, 23 and 24 are now pending in the application. Claims 1, 10, 12, 21, 23 and 24 are independent claims.

II.   Request for Allowance

Applicant respectfully submits that the claims of this application are in condition for allowance. Accordingly, allowance is requested. If a conference would assist in placing this application in better condition for allowance, the undersigned would appreciate a telephone call

at the number indicated.

Respectfully submitted,

Milbank, Tweed, Hadley & McCloy LLP

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Chris L. Holm

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